

## Appointment

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**From:** Marcus, Pam [marcus.pam@epa.gov]  
**Sent:** 7/31/2020 1:16:25 PM  
**To:** Allenbach, Becky [Allenbach.Bekky@epa.gov]; Able, Tony [Able.Tony@epa.gov]; Wetherington, Michele [Wetherington.Michele@epa.gov]; Bouma, Stacey [Bouma.Stacey@epa.gov]; Cooper, Jamal [cooper.jamal@epa.gov]; Ghosh, Mita [Ghosh.Mita@epa.gov]

**Subject:** Georgia Narrative WQS Revision

**Location:** Microsoft Teams Meeting

**Start:** 8/19/2020 3:00:00 PM

**End:** 8/19/2020 4:00:00 PM

**Show Time As:** Tentative

**Required Attendees:** Allenbach, Becky; Tony Able (Able.Tony@epa.gov); Michele Wetherington; Stacey Bouma (Bouma.Stacey@epa.gov); Cooper, Jamal; Ghosh, Mita

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Purpose of Meeting: To brief the Division Director on the options to address the Georgia Narrative water quality standards submittal.

Background: GAEPD submitted two revisions to their water quality standards (WQS) “free from” narrative criteria on August 28, 2018. GAEPD stated that the revisions are a clarification only and do not change the stringency of the narrative. EPA staff found the change was substantive. Staff recommend approval of revision #1, which changed the words, “legitimate uses” to “designated use of the water body,” and due to lack of justification, disapproval of revision #2, which added the word, “unreasonably” in front of the word “interfere.” After briefing the DD and the former RA in September and October, EPA sent a letter on October 5, 2018, notifying the state that the initial response did not include sufficient justification and offered GAEPD the opportunity to provide additional documentation including methods and analysis for each parameter to demonstrate how “unreasonably” interfere will protect the most stringent designated use. EPA also requested that GAEPD clarify its interpretation of the court cases that included language that was inconsistent with the CWA. EPA received a memo in response on November 2, 2018. The memo did not include any new technical information including, “methods used and analyses conducted to support water quality standards revisions” to satisfy that requirement in 40 C.F.R. 131.6. There is also insufficient information for the analysis of the required effects determinations on species for ESA Section 7 consultation.

Expectations from Meeting: Ensure that the presentation and materials prepared for the RA briefing address the information deemed necessary by the DD.